

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

**TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider whether certain materials should be sealed. Plaintiffs file these materials under seal out of an abundance of caution because they contain references to documents produced and marked confidential by Uber.

**Material To Be Filed Under Seal**

The materials to be filed under seal are portions of the parties' Joint Letter Regarding Defendants' Production of Hyperlinked Documents and exhibits attached thereto. Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Exhibit B to the Declaration of R. Luhana ISO Joint Letter Regarding Defendants' Production of Hyperlinked Documents	Document designated confidential	Uber
Exhibit C to the Declaration of R. Luhana ISO Joint Letter Regarding Defendants' Production of Hyperlinked Documents	Document designated confidential	Uber
Exhibit D to the Declaration of R. Luhana ISO Joint Letter Regarding Defendants' Production of Hyperlinked Documents	Document designated confidential	Uber
Exhibit E to the Declaration of R. Luhana ISO Joint Letter Regarding Defendants' Production of Hyperlinked Documents	Document designated confidential	Uber
Exhibit F to the Declaration of R. Luhana ISO Joint Letter Regarding Defendants' Production of Hyperlinked Documents	Document designated confidential	Uber

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs. Pursuant to the Court’s order at Dkt. 1559, Uber must file its statement within one day.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Roopal P. Luhana in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

1 Dated: January 31, 2025

Respectfully submitted,

2 By: /s/ Roopal P. Luhana

3 Roopal P. Luhana

4 **CHAFFIN LUHANA LLP**

600 Third Avenue, 12th Floor

5 New York, NY 10016

Telephone: (888) 480-1123

6 Facsimile: (888) 499-1123

7 luhana@chaffinluhana.com

8 By: /s/ Sarah R. London

9 Sarah R. London (SBN 267093)

10 **LIEFF CABRASER HEIMANN &  
11 BERNSTEIN, LLP**

275 Battery Street, 29th Floor

12 San Francisco, CA 94111-3339

13 Telephone: (415) 956-1000

Facsimile: (415) 956-1008

14 slondon@lchb.com

15 By: /s/ Rachel B. Abrams

16 Rachel B. Abrams (SBN 209316)

17 **PEIFFER WOLF CARR KANE  
18 CONWAY & WISE, LLP**

555 Montgomery Street, Suite 820

19 San Francisco, CA 94111

Telephone: (415) 426-5641

20 Facsimile: (415) 840-9435

rabrams@peifferwolf.com

21 *Co-Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on January 31, 2025, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to registered parties.

/s/Roopal Luhana